

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA

v.

ARNOLD ZSOLT HATHAZI
a/k/a Marcus Henderson, a/k/a Lawrence
Cain, a/k/a James Gill, a/k/a James Ellis,
a/k/a Richard Green

Criminal No: 4:25mj 00032-MCR1

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, Victor Gomez, being duly sworn upon oath, depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI") presently assigned to the HSI Charleston, South Carolina office. I have been employed by ICE-HSI, and its predecessor, the Immigration and Naturalization Service ("INS") as a United States Border Patrol Agent since June 2, 1997, and transferred to the Washington D.C., District Office of Investigations as a Special Agent on September 9, 2002. As of March 2003, I have been assigned as an ICE and subsequently as an HSI Special Agent under the Department of Homeland Security (DHS). My duties and responsibilities as an HSI Special Agent involve enforcing federal statutes and conducting investigations relating to immigration and customs laws and investigating other violations against the United States, including administrative violations under the Immigration and Nationality Act (INA). I have successfully completed the Border Patrol Training Academy at the Federal Law Enforcement Training Center (FLETC) in Charleston, South Carolina, and Criminal Investigators Training Program at the FLETC in Glynco, Georgia, and have received extensive training and

experience related to the enforcement of immigration, customs, and other criminal violations under the jurisdiction of HSI.

2. As an HSI Special Agent, I received extensive basic and advanced training at the FLETC in Glynnco, Georgia, and through other ICE, Federal and State training facilities and courses. I have been trained in various aspects of the laws of the United States, including continued basic and advanced training relating to offenses enforced by HSI. I have also obtained significant experience through a variety of investigations involving a multitude of matters during my tenure as a federal law enforcement officer and have functioned in a variety of capacities, including but not limited to: a case agent coordinating enforcement operations, conducting undercover activities, and supervising confidential informants; conducting surveillance and observing and recording activity involving gang members, drug traffickers, human smugglers and traffickers as well as individuals involved in other illicit contraband and firearm-related offenses; and interviewing witnesses, cooperating defendants, and/or informants related to investigated offenses. I have further conducted or participated in the execution of numerous search and arrest warrants in connection with the above-mentioned investigations.

3. Based upon my training and experience, interviews conducted with defendants, informants, and other witnesses to, or participants in, narcotics, financial, human smuggling, immigration and other related investigations, I am familiar with the ways in which individuals, businesses and criminal organizations attempt to conduct and conceal their illicit financial activities. This includes the various means and methods used by individuals and their conspirators to use fraudulent documentation and government-issued identity documents to conceal their identity or use the identity of others to engage in illicit financial transactions and attempt to conceal, seclude, and shield themselves and their illicit activity from detection by law enforcement.

II. PURPOSE OF THE AFFIDAVIT

4. This affidavit contains information in support of probable cause for a criminal complaint and arrest warrant, charging Arnold Zsolt HATHAZI, with violating Title 18, United States Code, Section 1028(a)(6), Possession of a Stolen or Unlawfully Produced Identification Document.

5. The factual information set forth in this Affidavit was obtained during the course of this investigation by myself or has been provided to me directly or indirectly by other HSI Special Agents and law enforcement officers involved with this case.

III. INTRODUCTORY SUMMARY

6. On May 8, 2025, Arnold HATHAZI was encountered in Florence, South Carolina, during a traffic stop conducted by the South Carolina Highway Patrol (SCHP) of a car driven by HATHAZI for speeding. HATHAZI was the car's only occupant. During the stop conducted by the SCHP, the SCHP trooper noticed the odor of marijuana coming from inside the car while standing at the front passenger window. The trooper asked for HATHAZI's driver's license, registration, and insurance and advised him why he was stopping him. HATHAZI apologized for speeding, advised the trooper that he was a Romanian police officer in his home country of Romania, and showed the trooper a badge. A probable cause search of the car was subsequently conducted based on the odor of marijuana.

7. During the search of the car, a trooper located a bag with a mason jar containing what appeared to be marijuana, a pink bottle with what appeared to be marijuana pills, a bag containing four bundles of U.S. currency (each bundle was wrapped in rubber bands), and cell phones in the trunk of the car. A trooper also located a bag containing a shredded driver's license, social security cards, and other shredded items; several credit cards, driver's licenses, and social

security cards in different names; several cell phones; and an open bottle of beer in the car. The ID cards contained HATHAZI's face but with different hair and facial hair. In HATHAZI's wallet was approximately \$2,600.00 in U.S. currency and a driver's license with another name and a debit card with that same name. Troopers located a total of 17 cell phones and \$43,426.00 in U.S. currency. HSI was contacted due to suspicious activity involving the possession of various identification documents, cell phones, and U.S. currency found during the search of the car.

8. An HSI Task Force Officer (TFO) with the Florence County Sheriff's Office (FCSO) responded to the scene to assist with the stop and further informed me that HATHAZI was allegedly traveling from Miami, Florida, to Boston, Massachusetts. HATHAZI was subsequently arrested by an FCSO TFO for the possession of marijuana, and an immigration detainer was lodged.

9. Record checks conducted by HSI showed that HATHAZI was a Hungarian Citizen born in Romania that last entered the United States as a temporary visitor for pleasure (B-2) on July 26, 2023, through the Boston Logan International Airport in Massachusetts and overstayed beyond his authorized period of admission. HATHAZI was scheduled to depart the U.S. on a flight on August 28, 2023, but he did not depart.

10. HSI Special Agents (SAs) Victor Gomez and Hailey Barraco responded to the FCSO to review items discovered pursuant to the encounter and arrest of HATHAZI. Some of the identification documents found in HATHAZI's possession pursuant to his arrest included drivers' licenses and social security cards with the information in the list below.

| Document Type | Document Number | Name | DOB | Issue/Exp Date | Legal Issuing Authority | Record Checks |
|----------------|-----------------|------------|-----------------|-----------------------|--------------------------------|------------------|
| Driver license | WDL31888F03B | [REDACTED] | [REDACTED]/1991 | 09/07/2024-09/12/2029 | Washington DOL | Pos # / name |
| Driver license | H05540196405906 | [REDACTED] | [REDACTED]/1990 | 01/22/2023-05/21/2027 | New Jersey MVC | Neg |
| Driver license | E07116216502924 | [REDACTED] | [REDACTED]/1992 | 03/08/2022-02/10/2026 | New Jersey MVC | Neg |
| Driver license | G05510196405914 | [REDACTED] | [REDACTED]/1991 | 08/10/2023-05/16/2027 | New Jersey MVC | Neg |
| Driver license | 54133765 | [REDACTED] | [REDACTED]/1991 | 12/22/2022-05/16/2030 | Georgia DDS | Pos # / Neg Name |
| SSN Card | [REDACTED]-4476 | [REDACTED] | NA | NA | Social Security Administration | Neg |
| SSN Card | [REDACTED]-6339 | [REDACTED] | NA | NA | Social Security Administration | Neg |
| SSN Card | [REDACTED]-5884 | [REDACTED] | NA | NA | Social Security Administration | Pos |
| SSN Card | [REDACTED]-5632 | [REDACTED] | NA | NA | Social Security Administration | Neg |
| SSN Card | [REDACTED]-7449 | [REDACTED] | NA | NA | Social Security Administration | Neg |
| SSN Card | [REDACTED]-1589 | [REDACTED] | NA | NA | Social Security Administration | Pos/Deceased |
| ID Card | A5010864 | [REDACTED] | [REDACTED]/1991 | NA | Canada | |
| Driver license | V208312099104 | [REDACTED] | [REDACTED]/1991 | 9/9/2021-09/12/2029 | Quebec, Canada | |
| Passport | HM844540 | [REDACTED] | [REDACTED]/1991 | 6/20/2022-06/20/2023 | Canada | |

11. Record checks conducted through DHS indices indicated that the majority of the U.S. drivers' licenses in the list did not correspond to valid driver information linked with the respective State's issuing agency.

12. Record checks associated with the Georgia driver's license listed above showed that the number printed on the document is assigned to an individual with a different name, date of birth, address and gender than that depicted on the license in HATHAZI's possession.

13. Record checks conducted through DHS indices and commercial databases yielded negative results for four of the social security cards listed above, meaning no individual in those databases was associated with those four social security cards.

14. The social security card bearing the last four digits 5884 and the name [REDACTED] was found in ACCURINT.¹ Information was linked to an individual with the same name on the card and several other names with addresses in Illinois and an address in Indiana.

15. The social security card bearing the last four digits 1589 and the name [REDACTED] was also found in ACCURINT and indicated that the card belonged to an individual identified as being deceased. Bank cards with the name [REDACTED] and an IRS document for

¹ ACCURINT is an online investigative application used to connect and analyze critical information related to people, businesses, assets, affiliations, and other vital data from a vast collection of public records.

an employer identification number (EIN: 33-3917842) were also found with the items recovered during the arrest.

16. Additional documentation found included various other bank cards, bank documents, business documents, tax information, and other documentation associated with some of the suspected fraudulently procured identification documents.

17. In total, investigators seized at least fifteen identification documents from HATHAZI that appear to be either stolen or produced without lawful authority, at least eleven of which appear to be issued in the United States.

18. HATHAZI also had a Washington State driver's license, a Romanian driver's license, and an identification card depicting his information and photo. Information contained in these documents appear to be associated with his true identity.

19. At approximately 6:47 p.m., HSI SAs Gomez, Barraco and TFO Rauch visited with HATHAZI at the detention facility. While at the facility, SA Gomez informed HATHAZI that he wished to interview him. HATHAZI was advised of his *Miranda* rights, which he stated he understood and signed the warning of rights form prior to questioning. During questions asked, HATHAZI stated that his true name was Arnold HATHAZI and verified biographical information. HATHAZI stated he is a Hungarian citizen, and that he was born in Romania.

20. HATHAZI stated that the Washington State driver's license was valid, and that he obtained it after attending a driving school in that state while staying with a friend.

21. HATHAZI admitted to being in the U.S. unlawfully after failing to depart as required and as described in paragraph 9.

22. HATHAZI was asked about the procurement of identification documents he had. HATHAZI was vague and appeared to be deceptive when answering related questions. HATHAZI

explained that he would receive the documents from an unknown subject that would give him the identification cards with a cell phone and instructions on what to do with them.

23. HATHAZI admitted to opening accounts with the identification documents he claimed to have obtained from the unknown source, which had his picture and fraudulent information, to obtain bank cards and receive money from the alleged sale of cars. HATHAZI said he would also be provided with or obtain cell phones to use with the opening of accounts. HATHAZI said he utilized the chat application Telegram on the above-mentioned cell phones to communicate with these unknown suspects.


24. HATHAZI said another unknown individual would then provide him with instructions of when to withdraw money from a bank account and where to leave it. HATHAZI explained instances where money from these transactions would just be left in a public area or park for someone to retrieve. This activity is believed to be associated with an ongoing illicit financial scheme.

25. HATHAZI said the pictures on identification documents were from a photo taken of him, which he claimed were then altered by an unknown subject and used on the various identification documents.

IV. CONCLUSION

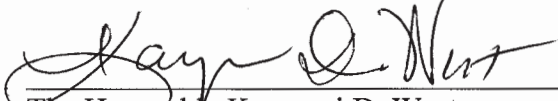
26. Based on the foregoing information contained in this affidavit, as well as my training and experience, I submit to the Court that probable cause exists to believe that Arnold Zsolt HATHAZI has committed and is involved with violations under Title 18, United States Code, Section 1028(a)(6), Possession of a Stolen or Unlawfully Produced Identification Document.

27. This affidavit was reviewed by Assistant United States Attorney Lauren Hummel.



Victor Gomez, Special Agent
U.S. Department of Homeland Security
Immigration and Customs Enforcement
Homeland Security Investigations

Sworn and subscribed to me this 22 day of May, 2025.



The Honorable Kaymani D. West
United States Magistrate Judge